

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**EASTERN PROFIT CORPORATION
LIMITED,**

Eastern/Counterclaim Defendant,

v.

STRATEGIC VISION US, LLC,

Defendant/Counterclaim Eastern.

Case No. 18-cv-2185 (LJL)

**DEFENDANT/COUNTERCLAIMANT STRATEGIC VISION US, LLC (SV)'S TRIAL
EXHIBIT INDEX**

✓ = offered & admitted w/o objection Ex = offered, but objected to and excluded DB = admitted, de bene	Ltd = admitted for limited purposes X = offered & admitted over objection NO = marked, but not offered WD = offered then withdrawn
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*Strategic has removed from this list all exhibits excluded buy the Court's *in limine* ruling, Dkt. 301. The exhibits excluded by the Court's *in limine* ruling are: DX-32, DX-34, DX-41, DX-43, DX-44, DX-49, DX-72, DX-73, DX-74, DX-77, DX-82, DX-87, DX-88, DX-89, DX-90, DX-92, DX-93, DX-94, DX-95, DX-101, and DX-116.

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
DX-1				Second Amended Complaint, ECF 93, Dated May 9, 2019	Cond. ¹	
DX-2				Strategic Vision's Amended Answer to Second Amended Complaint and Counterclaims, ECF 127, Dated August 8, 2019	Cond.	
DX-3				Eastern Profit's Answer to Amended Counterclaim, ECF 142, August 21, 2019	Cond.	
DX-4*				Research Agreement: Yvette EASTERN-000005		✓

¹ A key explaining Eastern's objections is set forth at the end of Strategic's exhibit list.

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
				Wang Depo Exhibit 2 – December 29, 2017		
DX-5 (T)				Yvette Wang Depo Exhibit 3 – Eastern Profit Responses to 1 st Interrogatories	Cond.; Object to translation as untimely	
DX-6				Yvette Wang Depo Exhibit 4 – 1/1/18 Draft of Research Agreement	EASTERN-000001 Parol	
DX-7				Yvette Wang Depo Exhibit 5 – L. Han Text	SVUS000061 106; 801/802; Parol	
DX-8*				Yvette Wang Depo Exhibit 6 – 2/23/18 Termination Letter from Foley Hoag Law Firm to Strategic Vision	EASTERN-000198	✓
DX-9*				Yvette Wang Depo Exhibit 7 – Wire Transfer Document Indicating Transfer from ACA	EASTERN-000021	✓
DX-10				Yvette Wang Depo Exhibit 8 – Wire Transfer Request to Cancel/Reverse by ACA	EASTERN000279 402; 403; 602	
DX-11				Yvette Wang Depo Exhibit 9 – S. Hon (of ACA) Email Re: Request to Cancel/Reverse Wires	EASTERN000276 402; 403; 602	
DX-12				Yvette Wang Depo Exhibit 11 - Complaint	402	
DX-13*				Yvette Wang Depo Exhibit 12 –A. Suen, First Name in Package of Research Subjects	SVUS000171	✓
DX-14				Yvette Wang Depo Exhibit 13 – Report on Q. Yao	EASTERN-000144 402; 403; 603; 801/802	
DX-15				Yvette Wang Depo Exhibit 14 – Report on C. Liu	EASTERN-000023 402; 403; 603; 801/802	
DX-16				Yvette Wang Depo Exhibit 15 – French Text	EASTERN-000208 Cond.	

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
DX-17				Yvette Wang Depo Exhibit 16 – French Text	EASTERN-000214 Cond.	
DX-18				Yvette Wang Depo Exhibit 17 – French Text	EASTERN-000220 Cond.	
DX-19				Yvette Wang Depo Exhibit 18 – French Text	EASTERN-000223 Cond.	
DX-20				Yvette Wang Depo Exhibit 19 – Waller Text	EASTERN-000262 Cond.	
DX-21				Yvette Wang Depo Exhibit 20 – Waller Text	EASTERN-000265 Cond.	
DX-22				Yvette Wang Depo Exhibit 21 – Waller Text	EASTERN-000259 Cond.	
DX-23				Yvette Wang Depo Exhibit 22 – Waller Text	EASTERN-000257 Cond.	
DX-24 (T)				Limited Power of Attorney Eastern Profit to Golden Spring (New York) Ltd.: Guo Wengui Depo Exhibit 2	EASTERN-000276 402; 403; Object to translation as untimely	
DX-25				Guo Wengui Depo Exhibit 4 – Chinese Article	402; 403; 602; 701; 801/802; 901; E	
DX-26				Karin Maistrello Depo Exhibit 1 – Resignation Email	402; 403	
DX-27				Karin Maistrello Depo Exhibit 2 – Resignation Letter	402; 403	
DX-28				Karin Maistrello Depo Exhibit 3 – SV’s Notice of Subpoena to ACA	402; 403	
DX-29				Karin Maistrello Depo Exhibit 4 – SV’s Notice of Subpoena to K. Maistrello	402; 403	
DX-30				Karin Maistrello Depo Exhibit 5 – ACA Notice of Change of Sec. and Director	402; 403	
DX-31				Karin Maistrello Depo Exhibit 6 – ACA Director Info	402; 403; 602; 901	

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
DX-33				Lianchao Han Depo Exhibit 3 – April 29, 2017 Video Translation	106; 402; 403; 602; 701; 801/802; 901; 1001-1004	
DX-35				Lianchao Han Depo Exhibit 5 – August 26, 2017 Letter Guo Wengui	106; 402; 403; 602; 701; 801/802; 901; 1001-1004	
DX-36				Lianchao Han Depo Exhibit 6 – January 18, 2018 Video Translation	106; 402; 403; 602; 701; 801/802; 901; 1001-1004; E	
DX-37				Lianchao Han Depo Exhibit 7 – Flash Drive of March 5, 2017 Video and Video 4	106; 402; 403; 602; 701; 801/802; 901; 1001-1004; E	
DX-38				Lianchao Han Depo Exhibit 8 – Vision Paper Prepared by M. Waller	SVUS000077 402; Parol	
DX-39				Lianchao Han Depo Exhibit 9 – Three-year Timeline	SVUS000080 402; Parol	
DX-40				Lianchao Han Depo Exhibit 10 – L. Han Text	CONFIDENTIAL _SVUS001842 402; 801/802; Parol	
DX-42				William Gertz Depo Exhibit 1 – French 11/11/17 Email	GERTZ-000001 402; 403	
DX-45				Eastern 30(b)(6) Depo Exhibit 30 – SV's Depo Notice	402	
DX-46				Chunguang Han Depo Exhibit 30 – EP Notice of Change of Sec. and Director	EASTERN-000400 106; Cond.	
DX-47				Chunguang Han Depo Exhibit 31 – Written Notes	402; 403	
DX-48 (T)				Chunguang Han Depo Exhibit 33 – Dkt. 37 EP Sub. of Counsel	402; 403; Object to translation as untimely	
DX-50				Golden Spring 30(b)(6) Depo Exhibit 1 – SV's Duces Tecum Depo Notice	402; 403	

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
DX-51 (T)				Golden Spring 30(b)(6) Depo Exhibit 3 – Dkt. 20-4 Dec. of G. Wengui	402; 403; Object to translation as untimely	
DX-52				Golden Spring 30(b)(6) Depo Exhibit 4 – Application for Authority	402; 403; 602; 701; 801/802	
DX-53*				Strategic Vision 30(b)(6) Depo Exhibit 102 - EASTERN-000020		✓
DX-54*				Strategic Vision 30(b)(6) Depo Exhibit 103 – Citibank Statement CONFIDENTIAL_SVUS001954		✓
DX-55*				Strategic Vision 30(b)(6) Depo Exhibit 104 – Georgetown Research Invoice CONFIDENTIAL_SVUS001955		✓
DX-56				Strategic Vision 30(b)(6) Depo Exhibit 105 – Allied Special Operations Invoice SVUS000263	Cond.	
DX-57				Strategic Vision 30(b)(6) Depo Exhibit 106 – Written Notes CONFIDENTIAL_SVUS001762	Cond.	
DX-58*				Strategic Vision 30(b)(6) Depo Exhibit 107 – Invoice to Georgetown Research CONFIDENTIAL_SVUS001961		✓
DX-59*				Strategic Vision 30(b)(6) Depo Exhibit 108 – Invoice to Georgetown Research CONFIDENTIAL_SVUS001966		✓
DX-60*				Strategic Vision 30(b)(6) Depo Exhibit 109 – Invoice to Georgetown Research CONFIDENTIAL_SVUS001972		✓
DX-61*				Strategic Vision 30(b)(6) Depo Exhibit 110 – Invoice for Reimbursement CONFIDENTIAL_SVUS001976		✓

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
DX-62*				Strategic Vision 30(b)(6) Depo Exhibit 111 – French Calendar	CONFIDENTIAL _SVUS002102	✓
DX-63*				Strategic Vision 30(b)(6) Depo Exhibit 112 – Fish Tank	CONFIDENTIAL _SVUS001688	✓
DX-64*				Strategic Vision 30(b)(6) Depo Exhibit 113 – Written Notes	CONFIDENTIAL _SVUS001939	✓
DX-65*				Strategic Vision 30(b)(6) Depo Exhibit 114 – Citibank Statement	CONFIDENTIAL _SVUS001907	✓
DX-66				Strategic Vision 30(b)(6) Depo Exhibit 115 – Fletcher Invoice	SVUS000272	Cond.
DX-67				August 28, 2017 Retainer/Engagement Letter Guo Wengui (through Lianchao Han) and Clark Hill, Record in Case 1:19-cv-03195-JEB, U.S. District Court for the District of Columbia	402; 403	
DX-68*				8/20/19 Eastern Profit's Responses to SV's Rule 26.1 Demand		✓
DX-69				9/27/19 Eastern Profit's Responses to Third ROG's	Cond.	
DX-70				Saraca Application for Authority	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-71				Bloomberg Article	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-75				Rule of Law Website	402; 403; 602; 701; 801/802; E	

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
					ADVANCED RULING REQUESTED	
DX-76				S. Chen Affidavit	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-76A				S. Chen Affidavit	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-78				Guo Affidavit – Dkt. 197-1	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-79				ACA Registration and Informational Public Records SVUS001574	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-80				Eastern Profit Registration and Informational Public Records EASTERN-000355	402; Cond.	
DX-81				GSNY Registration and Informational Public Records	402; 403; 602; 801/802; E; ADVANCED RULING REQUESTED	
DX-83				Genevere Registration and Informational Public Records SVUS002404	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-84				Rule of Law Foundation Information SVUS002436	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-85				Rule of Law Society Information SVUS002440	402; 403; 602; 701; 801/802; E	

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
					ADVANCED RULING REQUESTED	
DX-86				Hamilton Capital SVUS002425 Application for Authority	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-91				Gnews – SV	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-96				YouTube Voice of Guo Media	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-97				Overlapping YouTube IT Admin	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-97A				“战友之家Voice of Guo Media”	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-97B				“戰友之家直播”	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-97C				“Voice of Guo Media”	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-97D				“战友之家2019”	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
DX-97E				“Rolfoundation法治基金”	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-97F				Guo Wengui Youtube	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-98				Gnews – A Fake Pastor	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-99				Google-YouTube CONFIDENTIAL _SVUS019216	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-100				Google-Emails	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-100A				Certificate of Authenticity	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-100B				Certificate of Authenticity	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-102				GoDaddy (UNDER SEAL) CONFIDENTIAL _SVUS019194	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
DX-102A				Certificate of Authenticity CONFIDENTIAL _SVUS019191	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-103				GoDaddy (UNDER SEAL) CONFIDENTIAL _SVUS0019175	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-103A				Certificate of Authenticity CONFIDENTIAL _SVUS019172	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-104				GoDaddy (UNDER SEAL) CONFIDENTIAL _SVUS019208	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-104A				Certificate of Authenticity CONFIDENTIAL _SVUS019191	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-105				GoDaddy (UNDER SEAL) CONFIDENTIAL _SVUS019201	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-105A				Certificate of Authenticity CONFIDENTIAL _SVUS019191	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-106				GoDaddy (UNDER SEAL) CONFIDENTIAL _SVUS019175	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
DX-106A				Certificate of Authenticity CONFIDENTIAL _SVUS019172	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-107				GoDaddy (UNDER SEAL) CONFIDENTIAL _SVUS019181	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-107A				Certificate of Authenticity CONFIDENTIAL _SVUS019172	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-108				GoDaddy (UNDER SEAL) CONFIDENTIAL _SVUS019182	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-108A				Certificate of Authenticity CONFIDENTIAL _SVUS019172	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-109				CloudFlare Basic Billing (UNDER SEAL) SVUS010485 and CONFIDENTIAL _SVUS017880	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-109A				Certificate of Authenticity SVUS010426 and CONFIDENTIAL _SVUS017821	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-110				CloudFlare Billing Profile (UNDER SEAL) SVUS010486 and CONFIDENTIAL _SVUS017881	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
DX-110A				Certificate of Authenticity SVUS010426 and CONFIDENTIAL _SVUS017821	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-111				CloudFlare (UNDER SEAL) CONFIDENTIAL _SVUS017888	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-111A				Certificate of Authenticity SVUS010426 and CONFIDENTIAL _SVUS017821	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-112				CloudFlare Audit Log (UNDER SEAL) SVUS010432 and CONFIDENTIAL _SVUS017827	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-112A				Cloudflare Audit Log and WhoIs	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-112B				Cloudflare Audit Log and WhoIs	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-112C				Cloudflare Audit Log and WhoIs	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-112D				Cloudflare Audit Log and WhoIs	402; 403; 602; 701; 801/802; E ADVANCED RULING REQUESTED	
DX-112E				Cloudflare Audit Log and WhoIs	402; 403; 602; 701; 801/802; E	

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
					ADVANCED RULING REQUESTED	
DX-113				J. Ju Declaration (4/6/20) – Dkt. 273-49	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-114				Guo Wengui Depo SVUS001305 Exhibit 10 – Jessica Ju Affidavit (8/5/19)	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-115				J. Ju Translation (10/4/20)	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-117				Declaration of Jessica Ju Vol. 2	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-118 (T)				Steve Bannon Ally Guo Wengui is Targeting Chinese Dissidents	402; 403; 801/802; Object to translation as untimely ADVANCED RULING REQUESTED	
DX-119				The Long Arm of the Chinese Communist Party	402; 403; 801/802; ADVANCED RULING REQUESTED	
DX-120				Translation of material at https://www.youtube.com/watch?v=rxte-veGGi0&feature=youtu.be	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
DX-121				Translation of material at https://www.youtube.com/watch?v=S7K8GnK9RUM&feature=youtu.be	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-122				Declaration of Jessica Ju Vol. 3	402; 403; 602; 701; 801/802; 901; E ADVANCED RULING REQUESTED	
DX-123*				March 12, 2018 Email Exchange, Sasha Gong and Lianchao Han with attachment		✓
DX-124*				March 11, 2019 Email Exchange, Sasha Gong and Lianchao Han with attachment		✓
DX-125*				Waller Deposition Exhibit 11		✓
DX-126 (T)				Dkt. 203 Response Letter from J. Cline re: ACA	402; 403; 801/802; Object to translation as untimely ADVANCED RULING REQUESTED	
DX-126A (T)				Dkt. 203-1 Notice of Change of Company Secretary	402; 403; 801/802; Object to translation as untimely ADVANCED RULING REQUESTED	
DX-126B (T)				Dkt. 203-2 Restraint Order	402; 403; 801/802; Object to translation as untimely ADVANCED RULING REQUESTED	
DX-127*				Chunguang Han Depo EASTERN-000278-000280		✓

Ex. No.	Action Taken	Date	Time	Description	Objection	Stip. To Admiss.
				Exhibit 35 – Loan Agreement (PX11)		
				All exhibits needed to lay foundation/authenticate for evidence	Identification	
				All exhibits needed for impeachment	Identification	
				All exhibits listed by Plaintiff/Counterclaim Defendant Eastern Profit Corporation Limited	Identification	
				All pleadings, submissions to the Court, legal briefing, correspondence to the Court (including exhibits to the aforementioned items), and transcripts of Court hearings or conferences by any party or third party case participant in the above-captioned litigation	Identification	

Unless otherwise noted, the list below provides a key for the objections lodged by

Eastern above:

CODE	OBJECTION
106	Incomplete; the introduction of any remaining portions ought, in fairness, to be considered contemporaneously (Fed. R. Evid. 106).
402	Relevance (Fed. R. Evid. 402).
403	Misleading; undue prejudice; confusion of issues; waste of time (Fed. R. Evid. 403).
602	Personal knowledge; lack of foundation (Fed. R. Evid. 602).
701	Lay opinion or legal conclusion; the exhibit contains an impermissible opinion by a lay witness that is not reasonably based on perception or helpful to a clear understanding of the witness' testimony or to the determination of a fact in dispute (Fed. R. Evid. 701).
801/802	Hearsay; the exhibit is a statement made by one other than the witness while testifying at trial, offered into evidence to prove the truth of the matter asserted, and not subject to any hearsay exception (Fed. R. Evid. 801 and 802)
901	Authentication; exhibit has not been properly authenticated (Fed. R. Evid. 901)
1001-1004	Best evidence; the exhibit is objectionable because it is vague and ambiguous as to whether the witness is summarizing his or her own independent understanding of the contents of the document (Fed. R. Evid. 1001-1004).
E	Exhibit is objectionable because it constitutes attempted expert testimony from a person who was not designated as an expert (Fed. R. Civ. P. 26)
Cond.	Conditional objection; Eastern reserves the right to object to this exhibit at trial depending on the purpose for which plaintiffs seek to introduce it.
Des.	Improper means by which to designate deposition testimony. Eastern also incorporates all of the objections that it

	lodged to Strategic's deposition designations for the applicable deposition transcript.
Parol	Exhibit is objectionable to the extent it seeks to modify, amend, or contradict terms set forth in the Research Agreement.
Identification	Strategic has not sufficiently identified the exhibit such that Eastern can object or consent to admission